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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

RAUL ESTRADA-COVARRUBIAS,

Defendant.

Case No.: 2:20-cr-00319-JCM-EJY

**STIPULATION TO CONTINUE CHANGE
OF PLEA HEARING**

(First Request)

IT IS STIPULATED AND AGREED, between Ross C. Goodman, Esq., counsel for Defendant Raul Estrada-Covarrubias and Jason M. Frierson, Esq., United States Attorney, and Brenna Bush, Esq., Assistant United States Attorney that the Change of Plea Hearing currently scheduled for December 13, 2024, shall be vacated and rescheduled to January 10, 2025, at 10:30 a.m.

The stipulations are entered for these reasons:

1. The Government provided a revised section to the factual basis of the plea agreement.
2. The amended plea agreement will be translated into Spanish after which Defendant's Counsel will schedule a call to review with him.
3. Defendant is in custody and does not object to the continuance.
4. The parties agree to the continuances.
5. This request is not made for the purpose of undue delay but is necessary to

1 complete plea negotiations.

2 6. Additionally, denial of this request for continuance could result in a miscarriage
3 of justice. The additional time requested by this stipulation is excludable in computing the time
4 within which the trial must commence pursuant to the Speedy Trial Act, Title 18, United States
5 Code, Section 3161(h)(3)(D), 3161(h)(7)(A), 3161(h)(7)(B)(i) and 3161(h)(7)(B)(iv).
6

7 This is the parties' first request for a continuance relating to the Change of Plea hearing.
8 The court previously rescheduled the plea hearing from November 18, 2024, to November 20,
9 2024, due to court construction. However, Mr. Goodman was unavailable on November 20th and
10 the date was changed to December 10, 2024.

11 Dated this 10th day of December 2024.

12 ROSS C. GOODMAN, ESQ.
13 Appointed Counsel for Defendant

JASON M. FRIERSON
United States Attorney

14 /s/ Ross C. Goodman, Esq.

/s/ Brenna Bush, Esq.

15 By _____
16 Ross C. Goodman, Esq.
Attorney Raul Estrada-Covarrubias

By: _____
Brenna Bush, Esq.
Assistant United States Attorney

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ORDER

FINDINGS OF FACT

Based on the Stipulation of counsel and good cause appearing therefore, the Court finds:

1. The Government provided a revised section to the factual basis of the plea agreement.
2. The amended plea agreement will be translated into Spanish after which Defendant's Counsel will schedule a call to review with him.
3. Defendant is in custody and does not object to the continuance.
4. The parties agree to this first request for continuance. The court previously rescheduled the plea hearing from November 18, 2024, to November 20, 2024, due to court construction. However, Mr. Goodman was unavailable on November 20th and the date was changed to December 10, 2024.
5. This request is not made for the purpose of undue delay but is necessary to complete plea negotiations.

7. For all the above-stated reasons, the ends of justice would be best served by a continuance of the objection to report and recommendation and trial date.

The ends of justice served by granting said continuances outweigh the best interest of the public and the defendant in a speedy trial, since the failure to grant said continuance would be likely to result in a miscarriage of justice, would deny the parties herein sufficient time and the opportunity within which to be able to effectively and thoroughly prepare for trial, taking into account the exercise of due diligence.

ORDER

DATED 1 December 11, 2024.

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